

1 RUDY Y. KIM (CA SBN 199426)
RudyKim@mofo.com
2 ALAN COPE JOHNSTON (CA SBN 66334)
ACJohnston@mofo.com
3 MORRISON & FOERSTER LLP
755 Page Mill Road
4 Palo Alto, California 94304
Telephone: (650) 813-5600
5 Facsimile: (650) 494-0792

6 ALEXANDER J. HADJIS (pro hac vice)
AHadjis@mofo.com
7 JOSHUA A. HARTMAN (pro hac vice)
JHartman@mofo.com
8 MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue, NW
9 Suite 6000
Washington, DC 20006
10 Telephone: (202) 887-1500
Facsimile: (202) 887-0763

11 Attorneys for Defendant-Counterclaimant
12 FREESCALE SEMICONDUCTOR, INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**
17

18 MEDIATEK INC.,

19 Plaintiff,

20 v.

21 FREESCALE SEMICONDUCTOR, INC.,

22 Defendant.
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Civil Action No. 4:11-cv-05341 (YGR)

**FREESCALE'S STIPULATED
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL**

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,
2 Defendant Freescale Semiconductor, Inc. (Freescale) submits this motion for an order to file
3 under seal portions of Exhibit D-1 to MediaTek Inc.'s (MediaTek) Expert Report of Charles
4 Narad Regarding Infringement of U.S. Patent No. 6,088,753 (Narad Exhibit D-1).

5 Good cause exists for filing the redacted portions of Narad Exhibit D-1 under seal. See
6 Apple Inc. v. Samsung Elecs. Co., 2012-1600, 2013 U.S. App. LEXIS 17626, at *16 (Fed. Cir.
7 Aug. 23, 2013) (“[A] particularized showing of ‘good cause’ under Federal Rule of Civil
8 Procedure 26(c) is sufficient to preserve the secrecy of sealed discovery documents attached to
9 non-dispositive motions.”). As set forth in the Declaration of Mark Patrick, filed herewith, the
10 redacted portions cite or discuss highly confidential information on Freescale’s proprietary
11 technology found in Freescale documents marked “HIGHLY CONFIDENTIAL” pursuant to the
12 Stipulated Protective Order, Dkt. No. 100. This information is not disclosed outside of Freescale,
13 and disclosure could potentially harm Freescale by enabling its competitors to appropriate
14 Freescale’s proprietary technology.

15 Pursuant to Civil Local Rule 79-5(b), Freescale will lodge with the Clerk the documents at
16 issue, with accompanying chamber copies.

17 Pursuant to Civil Local Rule 7-11 and 7-12, Freescale and MediaTek stipulated to the
18 filing of this Motion on August 27, 2013. A signed stipulation is attached. See Joint Stipulation
19 to Freescale’s Administrative Motion to File Documents Under Seal.

20 For the foregoing reasons, Freescale requests that the Court enter the accompanying
21 Proposed Order granting Freescale’s Stipulated Administrative Motion to File Documents Under
22 Seal and designate the service copies of this document as “HIGHLY CONFIDENTIAL –
23 ATTORNEYS’ EYES ONLY.”

1 Dated: August 27, 2013

MORRISON & FOERSTER LLP

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3 By: /s/ Joshua A. Hartman

4 RUDY Y. KIM (CA SBN 199426)
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6 MORRISON & FOERSTER LLP
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Telephone: (650) 813-5600
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10 JOSHUA A. HARTMAN (pro hac vice)
JHartman@mofo.com
11 MORRISON & FOERSTER LLP
2000 Pennsylvania Avenue, NW
Suite 6000
12 Washington, DC 20006
Telephone: (202) 887-1500
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16
17 **ATTESTATION OF E-FILED SIGNATURE**

18 I, Rudy Y. Kim, am the ECF User whose ID and password are being used to file
19 Freescale's Stipulated Administrative Motion to File Documents Under Seal. In compliance with
20 General Order 45, X.B., I hereby attest that Joshua A. Hartman has concurred in this filing.

21 Dated: August 27, 2013

/s/ Rudy Y. Kim

Rudy Y. Kim